

RCRA Compliance Evaluation Inspection Report

1) Inspector and Author of Report

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2) Facility Information

Triumvirate Environmental Services Inc.
10100 Rocket Blvd
Orlando, Florida 32824-8565
County: Orange
EPA ID Number: FLD980559728
NAIC: 562211 – Hazardous Waste Treatment and Disposal

3) Responsible Official

Randy Troy, EHS Compliance Specialist
rtroy@triumvirate.com

4) Inspection Participants

Randy Troy, EHS Compliance Specialist, Triumvirate Environmental Services Inc.
Kevin Coulon, General Manager SE Region, Triumvirate Environmental Services Inc.
Tyler Klawinski, Facility Manager, Triumvirate Environmental Services Inc.
John White, Inspector, Florida Department of Environmental Protection (FDEP)
Miranda Rothenberger, Inspector, FDEP
David Champagne, Inspector, U.S. EPA

5) Dates of Inspection

April 6, 2021 09:15 a.m.

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

Florida Statutes (F.S.) Chapter 403.702 et seq., and the regulations promulgated pursuant thereto and set forth at the Florida Administrative Code (Fla. Admin. Code Ann. r.), Chapters 62-710, 62-730 and 62-750.

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 403.722 of the Florida Statutes, Fla. Stat. § 403.722 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Fla. Admin. Code Ann. r. 62-730.160(1) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

7) Purpose of Compliance Evaluation Inspection

On April 6, 2021, John White and Miranda Rothenberger, Florida Department of Environmental Protection (FDEP), and David Champagne, U.S. EPA, conducted a routine compliance evaluation inspection of Triumvirate Environmental Services Inc. (Triumvirate or facility) to determine the facility's compliance with state and federal hazardous waste regulations. This was an EPA lead inspection. Triumvirate Environmental Services Inc. was represented by Randy Troy, EHS Compliance Specialist, Kevin Coulon, General Manager SE Region, and Tyler Klawinski, Facility Manager. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit. The facility representatives provided a description of the facility and a process-based inspection was conducted.

8) Compliance History

Triumvirate was last inspected May 20, 2020 as a large quantity generator of hazardous waste. No violations were identified.

9) Facility Description

Triumvirate Environmental Services Inc. is located on 6 acres at 10100 Rocket Boulevard in Orlando, Florida. The most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated May 20, 2020, characterized the facility as a large quantity generator (LQG) of hazardous waste. The facility was issued a RCRA hazardous waste storage permit (Permit 26916-009-HO) on October 17, 2018 and allows for 824, 55-gallon drums (41,000 gallons) or 224 cubic yards of hazardous waste to be stored. The facility operates Monday through Friday opening at 6:30 AM and conducts shipping and receiving from 8 AM until 5 PM with approximately 15 employees. Triumvirate operates two box trucks, one tractor, and one tanker.

An additional box truck is rented as needed.

10) **Inspection Findings**

At the time of the inspection, Triumvirate was storing approximately 163 cubic yards of hazardous waste. The facility is permitted to store up to 224 cubic yards of hazardous and non-hazardous waste. Hazardous waste accepted by the facility is stored in its warehouse for up to a year before being shipped to an off-site treatment or disposal facility. At the time of the inspection, no containers were stored beyond a year. Hazardous and non-hazardous wastes are segregated at the facility according to compatibility groups as outlined in the permit. Storage areas have secondary containment to minimize and prevent possible releases to the environment. At the time of the inspection, there was a crack, or gap in the liner of the secondary containment (Photograph 1 of 1).

Pursuant to the RCRA Permit 26916-009-HO, Part II Subpart B.2 – Container Storage Unit [40 C.F.R. § 264.193(e)(1)(iii)], the Permittee shall inspect the integrity of the containment area to insure that it is free of cracks or gaps, and the concrete sealant remains impervious to leaks.

Located on the 10-Day loading dock were approximately 112 waste containers off-loaded from arriving trucks. The waste will be inspected, compared to the manifest(s) and profiles, and moved into the storage area. Staged adjacent to the loading dock was a 30-cubic yard container of non-hazardous solid waste destined for Wheelabrator South Broward, a municipal waste-to-energy facility located in South Florida. Also, adjacent to the loading dock is a two-compartment tank for used oil with a 15,00-gallon capacity, and Jet-A fuel with a 7,000-gallon capacity. The used oil container was labeled.

Inside the warehouse, storage containers are separated by compatibility groups into rows along the north wall, east wall, and south wall. Rows along the north wall are numbered from 101 to 105. Rows along the east wall are numbered from 201 to 210. Rows along the south wall are numbered from 301 to 306. The south, east, and north storage units are permitted to store 144, 240, and 440, 55-gallon drums, or the equivalent drum volume, respectively. At the time of the inspection, all containers were labeled, closed, and dated. Spill control equipment, no smoking signs, fire extinguishers, and eye-wash stations are available throughout the facility.

Inspection of the Consolidation and Waste Stabilization Area found the facility has not performed stabilization of metal bearing waste since 2015. The area is currently being used for repacking hazardous waste into lab packs or loose packs and for storage of non-hazardous wastewater destined for consolidation and off-site shipment to Aqua Clean Environmental, an industrial wastewater treatment facility. Wastes in the area included five totes of non-hazardous hot melt adhesive waste, twenty-five 55-gallon drums and two 5-gallon containers of nonhazardous wastewater, one cubic-yard bag of oily debris, and eight 55-gallon drums of limestone used for spill control.

Records

The inspection team conducted a record review of the facility's weekly inspections for the hazardous waste central accumulation area storage location. Training for staff managing

hazardous waste and Contingency Plan (August 3, 2020) were up to date. The contingency plan and quick reference guide had been sent to local authorities. A copy of the RCRA permit and application are on site and available for review.

11) **Summary**

The inspectors conducted the exit meeting with facility team presenting the preliminary results of the inspection. Triumvirate was inspected as a large quantity generator of hazardous waste. At the time of the inspection, the facility did not appear to be in compliance with a requirement of RCRA. The inspection concluded at approximately 12:00 hours.

12) **Signed**



David Champagne
Inspector and Author of Report

5/3/2021

Date

13) **Concurrence and Approval**

Araceli Chavez
Chief
RCRA Enforcement Section

Date

RCRA CEI Photographs for
Triumvirate Environmental Services Inc.
10100 Rocket Blvd
Orlando, Florida 32824-8565
Taken by: David Champagne, U.S. EPA
April 6, 2021
Camera Model: Google Pixel XL



Photograph 1 of 1: Secondary Liner in Hazardous Waste Storage Area